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17 *Attorneys for Defendant Elon Musk*

18 **UNITED STATES DISTRICT COURT**  
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 15 VERNON UNSWORTH,

21 16 Plaintiff,

22 17 vs.

18 ELON MUSK,

19 19 Defendant.

20 Case No. 2:18-cv-08048

21 Judge: Hon. Stephen V. Wilson

22 **DEFENDANT ELON MUSK'S  
PROPOSED VOIR DIRE  
QUESTIONS**

23 Complaint Filed: September 17, 2018  
24 Trial Date: December 3, 2019

25 Hearing Date: November 25, 2019  
26 Time: 3:00 p.m.  
27 Courtroom: 10A

28

1       Defendant Elon Musk respectfully submits the following voir dire questions  
2 for the Court's consideration:

- 3 1. Do you hold a strong opinion, whether negative or positive, about Elon
- 4 Musk?
- 5 2. Some of the evidence of this case will contain swear words or harsh
- 6 language. Will the use of such words or language affect your ability to be
- 7 fair and impartial?
- 8 3. Do you hold a strong opinion, whether negative or positive, about
- 9 somebody who is a billionaire?
- 10 4. Do you have any personal ties to, or have you spent considerable time in,
- 11 Thailand, the United Kingdom, or South Africa?

12 Please include the following question as a follow-up to the Court's voir dire  
13 regarding the criminal background of any potential juror:

14 5. Have you, or any close friend or family member, ever been accused of  
15 wrongdoing or criminal conduct?

16 Please including the following question among the biographical information  
17 requested from each potential juror:

18 6. From which source or sources do you get your news?

20 | DATED: November 21, 2019

Respectfully submitted,

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ *Alex Spiro*

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